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*Attorneys for the Federal Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Adriana Sierra,

Plaintiff,

v.

United States Department of Education;  
Equifax Information Services LLC; and  
Experian Information Solutions, Inc.

Defendant.

Case No. 2:24-cv-00296-APG-MDC

**Stipulation and Order to Extend Time  
to File a Response  
(First Request)**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff Adriana Sierra and Federal Defendant United States Department of Education, through undersigned counsel, hereby stipulate and agree as follows:

Plaintiff filed her complaint on February 12, 2024. ECF No. 1.

Plaintiff served Federal Defendant with a copy of the Summons and Complaint on February 20, 2024. ECF No. 5.

The current deadline for Federal Defendant to respond to Plaintiff's Complaint is April 22, 2024.

On April 11, 2024, counsel for Plaintiff and Federal Defendant agreed to a 30-day extension of time for Federal Defendant to retrieve the information needed to review and respond to the allegations in Plaintiff's Complaint.

1 Accordingly, the parties, through undersigned counsel, submit this stipulation to a  
2 30-day extension from **April 22, 2024**, to **May 22, 2024**, for Federal Defendant to file a  
3 Response to the Complaint. This is the first request for an extension of time.

4 This stipulated request is filed in good faith and not for the purposes of undue delay.

5 Respectfully submitted this 11th day of April 2024.

6 FREEDOM LAW FIRM, LLC

JASON M. FRIERSON  
United States Attorney  
Nevada Bar No. 7709

8 /s/ Gerardo Avalos  
9 GERARDO AVALOS, ESQ.  
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15 **IT IS SO ORDERED:**

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19 **Hon. Maximiliano D. Couvillier III**  
20 **UNITED STATES MAGISTRATE JUDGE**  
21 **DATED: April 12, 2024**